

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION**

**This Document Relates To:**

**THE DEALERSHIP CLASS ACTION**

**MDL No. 2817**

**Case No. 18-cv-00864**

**Honorable Robert M. Dow, Jr.  
Magistrate Judge Jeffrey T. Gilbert**

**DEALERSHIP COUNTER-DEFENDANTS' MOTION TO COMPEL RESPONSES TO  
INTERROGATORIES**

Counter-Defendants ACA Motors, Inc.; Continental Classic Motors, Inc.; 5800 Countryside, LLC; HDA Motors, Inc.; H & H Continental Motors, Inc.; Continental Autos, Inc.; Naperville Zoom Cars, Inc.; NV Autos, Inc.; Baystate Ford Inc.; Cliff Harris Ford, LLC; Marshall Chrysler Jeep Dodge, L.L.C.; Warrensburg Chrysler Dodge Jeep, L.L.C.; Cherry Hill Jaguar; JCF Autos LLC; Jericho Turnpike Sales LLC; Patchogue 112 Motors LLC; and Waconia Dodge, Inc. (collectively, "Counter-Defendants" or "Dealership Counter-Defendants") respectfully move this Court for an Order under Fed. R. Civ. P. 37(a) directing Defendant and Counterclaim Plaintiff CDK Global, LLC ("CDK") to respond to Dealership Class Plaintiffs' First Set of Interrogatories Concerning CDK's Counterclaims. In support of this motion, Counter-Defendants submit the accompanying memorandum of law.

Pursuant to Local Rule 37.2, counsel for Dealership Plaintiffs certify that they have met and conferred with counsel for CDK, through written correspondence and in a telephonic meet and confer on August 8, 2019, in a good faith attempt to resolve the dispute presented by this Motion. The parties have been unable to resolve the dispute, thereby necessitating this Motion.

Dated: August 12, 2019

Respectfully submitted,

/s/ Peggy J. Wedgworth

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**CERTIFICATE OF SERVICE**

I, Peggy J. Wedgworth, an attorney, hereby certify that on August 12, 2019, I caused a true and correct copy of the foregoing DEALERSHIP COUNTER-DEFENDANTS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth